

UNITED STATES DISTRICT COURT

for the

____ District of _____
 v. _____)
)
) Case No.:
)
)
)

BILL OF COSTS

Judgment having been entered in the above entitled action on _____ *Date* against _____,
 the Clerk is requested to tax the following as costs:

Fees of the Clerk	\$ _____
Fees for service of summons and subpoena	_____
Fees for printed or electronically recorded transcripts necessarily obtained for use in the case	_____
Fees and disbursements for printing	_____
Fees for witnesses (<i>itemize on page two</i>)	_____
Fees for exemplification and the costs of making copies of any materials where the copies are necessarily obtained for use in the case	_____
Docket fees under 28 U.S.C. 1923	_____
Costs as shown on Mandate of Court of Appeals	_____
Compensation of court-appointed experts	_____
Compensation of interpreters and costs of special interpretation services under 28 U.S.C. 1828	_____
Other costs (<i>please itemize</i>)	_____
TOTAL \$ _____	

SPECIAL NOTE: Attach to your bill an itemization and documentation for requested costs in all categories.

Declaration

I declare under penalty of perjury that the foregoing costs are correct and were necessarily incurred in this action and that the services for which fees have been charged were actually and necessarily performed. A copy of this bill has been served on all parties in the following manner:

Electronic service First class mail, postage prepaid

Other: _____

s/ Attorney: _____

Name of Attorney: _____

For: _____ Date: 11/22/2022
Name of Claiming Party

Taxation of Costs

Costs are taxed in the amount of _____ and included in the judgment.

By: _____
Clerk of Court *Deputy Clerk* *Date*

	A	B	C	D
1	Date	Attorney	Cost For	Amount
2	5/19/2021	Defendant	Certified Copy of Deposition Transcript of Randy Knight	\$ 309.00
3	7/2/2021	Plaintiff	Certified Copy of Deposition Transcript of Bryan Cox	\$ 285.14
4	7/2/2021	Defendant*	Mileage to D&R Reporting in Tulsa for Plaintiff's Deposition of Brian Cox	\$ 116.48
5	7/6/2021	Defendant	Original and Certified Copy of Deposition Transcript of Laurie Garland	\$ 1,382.09
6	7/9/2021	Plaintiff	Certified Copy of Deposition Transcript of Penny Lewis	\$ 163.00
7	7/9/2021	Defendant*	Mileage to D&R Reporting in Tulsa for Plaintiff's Deposition of Penny Lewis	\$ 116.48
8	7/14/2021	Plaintiff	Certified Copy of Deposition Transcript of Christopher Redeagle	\$ 478.99
9	8/25/2022	Plaintiff	Certified Copy of Deposition Transcript of Sharon McCoy	\$ 363.00
10	8/25/2022	Defendant**	Mileage to McAlester for Plaintiff's Deposition of Sharon McCoy	\$ 161.00
11	TOTAL COSTS			\$ 3,375.18
12				
13	*mileage for the depositions of Bryan Cox and Penny Lewis were figured at the IRS Rate of .56 per mile x 208 miles (round trip)			
14				
15	** mileage for the deposition of Sharon McCoy was figured at the IRS Rate of .62 per mile x 260 miles (round trip)			
16				

*Leesa Thompson***I N V O I C E**

1 of 1

D&R Reporting & Video, Inc.
 Metropolitan Building
 400 N. Walker
 Suite 160
 Oklahoma City, OK 73102

Kari Hawkins
 Assistant Attorney General
 313 NE 21st
 Oklahoma City, OK 73105

Invoice No.	Invoice Date	Job No.
128996	7/27/2021	36652
Job Date	Case No.	
7/14/2021		
Case Name		
Garland v. State of OK		
Payment Terms		
Due upon receipt		

1 CERTIFIED COPY OF TRANSCRIPT OF:

Christopher Redeagle

478.99

TOTAL DUE >>>**\$478.99**

Location of Job : D & R - Tulsa
 401 S. Boston Ave., Ste 310
 Tulsa, OK 74103

All billing questions should be addressed within 15 days of receipt of invoice otherwise the billing will be considered accepted as billed.

Thank you for choosing D&R Reporting & Video, Inc., for all your litigation support needs. We appreciate your business.

(-) Payments/Credits:	478.99
(+) Finance Charges/Debits:	0.00
(=) New Balance:	\$0.00

Tax ID: 73-1334253

Please detach bottom portion and return with payment.

Kari Hawkins
 Assistant Attorney General
 313 NE 21st
 Oklahoma City, OK 73105

Invoice No. : 128996
 Invoice Date : 7/27/2021
Total Due : \$0.00

Remit To: **D&R Reporting & Video, Inc.**
Metropolitan Building
400 N. Walker
Suite 160
Oklahoma City, OK 73102

Job No. : 36652
 BU ID : 1-MAIN
 Case No. :
 Case Name : Garland v. State of OK

I N V O I C E

1 of 1

D&R Reporting & Video, Inc.
 Metropolitan Building
 400 N. Walker
 Suite 160
 Oklahoma City, OK 73102

Kari Hawkins
 Assistant Attorney General
 313 NE 21st
 Oklahoma City, OK 73105

Invoice No.	Invoice Date	Job No.
128996	7/27/2021	36652
Job Date	Case No.	
7/14/2021		
Case Name		
Garland v. State of OK		
Payment Terms		
Due upon receipt		

1 CERTIFIED COPY OF TRANSCRIPT OF:

Christopher Redeagle

478.99

TOTAL DUE >>>**\$478.99**

Location of Job : D & R - Tulsa
 401 S. Boston Ave., Ste 310
 Tulsa, OK 74103

All billing questions should be addressed within 15 days of receipt of invoice otherwise the billing will be considered accepted as billed.

Thank you for choosing D&R Reporting & Video, Inc., for all your litigation support needs. We appreciate your business.

Tax ID: 73-1334253

Please detach bottom portion and return with payment.

Kari Hawkins
 Assistant Attorney General
 313 NE 21st
 Oklahoma City, OK 73105

Invoice No. : 128996
 Invoice Date : 7/27/2021
Total Due : \$478.99

Remit To: **D&R Reporting & Video, Inc.**
Metropolitan Building
400 N. Walker
Suite 160
Oklahoma City, OK 73102

Job No. : 36652
 BU ID : 1-MAIN
 Case No. :
 Case Name : Garland v. State of OK

STATEMENT

1 of 1

D&R Reporting & Video, Inc.
 Metropolitan Building
 400 N. Walker
 Suite 160
 Oklahoma City, OK 73102

Account No.	Date
C7116	8/20/2021

Kari Hawkins
 Assistant Attorney General
 313 NE 21st
 Oklahoma City, OK 73105

1 - 30 days	31 - 60 days	61 - 90 days
\$478.99	\$0.00	\$0.00
91 - 120 days	121 days & Over	Total Due
\$0.00	\$0.00	\$478.99

Invoice Date	Invoice No.	Balance	Job No.	Job Date	Witness	Case
7/27/2021	128996	478.99	36652	7/14/2021	Christopher Redeagle	Garland v. State of OK

Tax ID: 73-1334253

Please detach bottom portion and return with payment.

Kari Hawkins
 Assistant Attorney General
 313 NE 21st
 Oklahoma City, OK 73105

Account No. :C7116
 Date :8/20/2021
Total Due :\$478.99

Remit To: **D&R Reporting & Video, Inc.**
Metropolitan Building
400 N. Walker
Suite 160
Oklahoma City, OK 73102

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

(1) LAURIE GARLAND, an)
individual,)
Plaintiff,)
-vs-) NO. CIV-2020-206-RW
)
(1) STATE OF OKLAHOMA EX REL)
OKLAHOMA DEPARTMENT OF)
CORRECTIONS)
(2) CHRISTOPHER REDEAGLE,)
individually)
(3) SHARON MCCOY, individually)
(4) JOE ALLBAUGH, individually)
(5) PENNY LEWIS, individually)
(6) RABEKAH MOONEYHAM,)
individually)
(7) HEATHER CARLSON,)
individually)
(8) BOARD OF CORRECTIONS)
Defendants.)



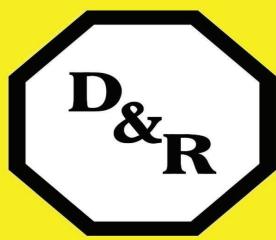
DEPOSITION OF CHRISTOPHER REDEAGLE

TAKEN ON BEHALF OF THE PLAINTIFF

IN TULSA, OKLAHOMA

On JULY 14, 2021

REPORTED BY: KASEY D. EGELSTON, CSR



METROPOLITAN BUILDING
400 North Walker, Suite 160
Oklahoma City, OK 73102
405-235-4106

MID-CONTINENT TOWER
401 South Boston, Suite 310
Tulsa, OK 74103
918-599-0507

depo@drreporting.com

REPORTING & VIDEO, INC.

Christopher Redeagle

July 14, 2021

Page 2

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JEB JOSEPH
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Assistant Attorney General
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Oklahoma City, Oklahoma 73105
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13 Attorney at Law
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Okmulgee, Oklahoma 74447
15 tony@anthonyallen.com

16 ALSO PRESENT:

17 Breann Johnson, Legal Intern
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19
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25

Christopher Redeagle

July 14, 2021

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*Leesa Thompson***I N V O I C E**

1 of 1

D&R Reporting & Video, Inc.
 Metropolitan Building
 400 N. Walker
 Suite 160
 Oklahoma City, OK 73102

Jeb Joseph
 Assistant Attorney General
 313 NE 21st
 Oklahoma City, OK 73105

Invoice No.	Invoice Date	Job No.
128983	7/26/2021	36547
Job Date	Case No.	
7/9/2021		
Case Name		
Garland v. Redeagle		
Payment Terms		
Due upon receipt		

1 CERTIFIED COPY OF TRANSCRIPT OF:

Penny Lewis

163.00

TOTAL DUE >>>**\$163.00**

Location of Job : D & R - Tulsa
 401 S. Boston Ave., Ste 310
 Tulsa, OK 74103

All billing questions should be addressed within 15 days of receipt of invoice otherwise the billing will be considered accepted as billed.

Thank you for choosing D&R Reporting & Video, Inc., for all your litigation support needs. We appreciate your business.

(-) Payments/Credits:	163.00
(+) Finance Charges/Debits:	0.00
(=) New Balance:	\$0.00

Tax ID: 73-1334253

Please detach bottom portion and return with payment.

Jeb Joseph
 Assistant Attorney General
 313 NE 21st
 Oklahoma City, OK 73105

Invoice No. : 128983
 Invoice Date : 7/26/2021
Total Due : \$0.00

Remit To: **D&R Reporting & Video, Inc.**
Metropolitan Building
400 N. Walker
Suite 160
Oklahoma City, OK 73102

Job No. : 36547
 BU ID : 1-MAIN
 Case No. :
 Case Name : Garland v. Redeagle

I N V O I C E

1 of 1

D&R Reporting & Video, Inc.
 Metropolitan Building
 400 N. Walker
 Suite 160
 Oklahoma City, OK 73102

Jeb Joseph
 Assistant Attorney General
 313 NE 21st
 Oklahoma City, OK 73105

Invoice No.	Invoice Date	Job No.
128983	7/26/2021	36547
Job Date	Case No.	
7/9/2021		
Case Name		
Garland v. Redeagle		
Payment Terms		
Due upon receipt		

1 CERTIFIED COPY OF TRANSCRIPT OF:

Penny Lewis

163.00

TOTAL DUE >>>**\$163.00**

Location of Job : D & R - Tulsa
 401 S. Boston Ave., Ste 310
 Tulsa, OK 74103

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Thank you for choosing D&R Reporting & Video, Inc., for all your litigation support needs. We appreciate your business.

Tax ID: 73-1334253

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Jeb Joseph
 Assistant Attorney General
 313 NE 21st
 Oklahoma City, OK 73105

Invoice No. : 128983
 Invoice Date : 7/26/2021
Total Due : \$163.00

Remit To: **D&R Reporting & Video, Inc.**
Metropolitan Building
400 N. Walker
Suite 160
Oklahoma City, OK 73102

Job No. : 36547
 BU ID : 1-MAIN
 Case No. :
 Case Name : Garland v. Redeagle

Penny Lewis

July 9, 2021

Page 1

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF OKLAHOMA

LAURIE GARLAND, an individual,)
)
)
Plaintiff)
)
)
v.) CIV-2020-306-Raw
)
)
STATE OF OKLAHOMA EX REL)
OKLAHOMA DEPARTMENT OF)
CORRECTIONS, CHRISTOPHER)
REDEAGLE, individually; SHARON)
MCCOY, individually; JOE)
ALLBAUGH, individually; PENNY)
LEWIS, individually; RABEKAH)
MOONEYHAM, individually;
HEATHER CARLSON, individually;
BOARD OF CORRECTIONS,)
)
Defendants.)

DEPOSITION OF
PENNY SUE LEWIS
HELD IN TULSA, OKLAHOMA
ON JULY 9TH, 2021

Prepared by: DEBORAH S. (DEBI) REINHARDT, CCR, CSR

Penny Lewis

July 9, 2021

Page 2

1 APPEARANCES

2 For the Plaintiff:

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14 ATTORNEY AT LAW

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15 OKMULGEE, OKLAHOMA 74447

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Penny Lewis

July 9, 2021

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STIPULATIONS

2

It is stipulated and agreed by and between
the parties hereto that all objections, except as to
the form of the questions, are reserved to the time
of trial with the same force and effect as if made
at the taking of the deposition.

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Penny Lewis

July 9, 2021

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*Lessa Thompson***I N V O I C E**

1 of 1

D&R Reporting & Video, Inc.
 Metropolitan Building
 400 N. Walker
 Suite 160
 Oklahoma City, OK 73102

Jeb Joseph
 Assistant Attorney General
 313 NE 21st
 Oklahoma City, OK 73105

Invoice No.	Invoice Date	Job No.
128927	7/20/2021	36546
Job Date	Case No.	
7/2/2021		
Case Name		
Garland v. Redeagle		
Payment Terms		
Due upon receipt		

1 CERTIFIED COPY OF TRANSCRIPT OF:

Bryan Cox

285.14

TOTAL DUE >>>**\$285.14**

Location of Job : D & R - Tulsa
 401 S. Boston Ave., Ste 310
 Tulsa, OK 74103

All billing questions should be addressed within 15 days of receipt of invoice otherwise the billing will be considered accepted as billed.

Thank you for choosing D&R Reporting & Video, Inc., for all your litigation support needs. We appreciate your business.

(-) Payments/Credits:	285.14
(+) Finance Charges/Debits:	0.00
(=) New Balance:	\$0.00

Tax ID: 73-1334253

Please detach bottom portion and return with payment.

Jeb Joseph
 Assistant Attorney General
 313 NE 21st
 Oklahoma City, OK 73105

Invoice No. : 128927
 Invoice Date : 7/20/2021
 Total Due : \$0.00

Remit To: **D&R Reporting & Video, Inc.**
Metropolitan Building
400 N. Walker
Suite 160
Oklahoma City, OK 73102

Job No. : 36546
 BU ID : 1-MAIN
 Case No. :
 Case Name : Garland v. Redeagle

I N V O I C E

1 of 1

D&R Reporting & Video, Inc.
 Metropolitan Building
 400 N. Walker
 Suite 160
 Oklahoma City, OK 73102

Jeb Joseph
 Assistant Attorney General
 313 NE 21st
 Oklahoma City, OK 73105

Invoice No.	Invoice Date	Job No.
128927	7/20/2021	36546
Job Date	Case No.	
7/2/2021		
Case Name		
Garland v. Redeagle		
Payment Terms		
Due upon receipt		

1 CERTIFIED COPY OF TRANSCRIPT OF:

Bryan Cox

285.14

TOTAL DUE >>>**\$285.14**

Location of Job : D & R - Tulsa
 401 S. Boston Ave., Ste 310
 Tulsa, OK 74103

All billing questions should be addressed within 15 days of receipt of invoice otherwise the billing will be considered accepted as billed.

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Jeb Joseph
 Assistant Attorney General
 313 NE 21st
 Oklahoma City, OK 73105

Invoice No. : 128927
 Invoice Date : 7/20/2021
Total Due : \$285.14

Remit To: **D&R Reporting & Video, Inc.**
Metropolitan Building
400 N. Walker
Suite 160
Oklahoma City, OK 73102

Job No. : 36546
 BU ID : 1-MAIN
 Case No. :
 Case Name : Garland v. Redeagle

Bryan Cox

July 2, 2021

Page 1

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF OKLAHOMA

LAURIE GARLAND, an individual,)
)
)
Plaintiff)
)
)
v.) CIV-2020-306-Raw
)
)
STATE OF OKLAHOMA EX REL)
OKLAHOMA DEPARTMENT OF)
CORRECTIONS, CHRISTOPHER)
REDEAGLE, individually; SHARON)
MCCOY, individually; JOE)
ALLBAUGH, individually; PENNY)
LEWIS, individually; RABEKAH)
MOONEYHAM, individually;
HEATHER CARLSON, individually;
BOARD OF CORRECTIONS,)
)
Defendants.)

DEPOSITION OF
BRYAN COX
HELD IN TULSA, OKLAHOMA
ON JULY 2ND, 2021

Prepared by: DEBORAH S. (DEBI) REINHARDT, CCR, CSR

Bryan Cox

July 2, 2021

Page 2

1 APPEARANCES

2 For the Plaintiff:

HENRY DALTON, ESQ.

3 KELLER, KELLER & DALTON

201 ROBERT S. KERR, #1001

4 OKLAHOMA CITY, OKLAHOMA 73102

405.235.6693

5 KKD.LAW@COXINET.NET

6 For the Defendants:

JEB JOSEPH, ESQ.

7 KARI Y. HAWKINS, ESQ.

ATTORNEY GENERAL'S OFFICE

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OKLAHOMA CITY, OKLAHOMA 73105

9 JEB.JOSEPH@OAG.OK.GOV

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11 For Defendant Joe Allbaugh:

ANTHONY ALLEN

12 106 S. OKMULGEE AVE.

OKMULGEE, OKLAHOMA 74447

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Bryan Cox

July 2, 2021

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6 of trial with the same force and effect as if made
7 at the taking of the deposition.

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Bryan Cox

July 2, 2021

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*Leesa Thompson***I N V O I C E**

1 of 1

D&R Reporting & Video, Inc.
 Metropolitan Building
 400 N. Walker
 Suite 160
 Oklahoma City, OK 73102

Kari Hawkins
 Assistant Attorney General
 313 NE 21st
 Oklahoma City, OK 73105

Invoice No.	Invoice Date	Job No.
128572	6/8/2021	36045
Job Date	Case No.	
5/19/2021		
Case Name		
Garland v. Eddie Warrior Correctional		
Payment Terms		
Due upon receipt		

1 CERTIFIED COPY OF TRANSCRIPT OF:

Randy Knight

309.00

TOTAL DUE >>>**\$309.00**

Location of Job : D & R OKC
 400 N. Walker, Suite 160
 Oklahoma City, OK 73102

All billing questions should be addressed within 15 days of receipt of invoice otherwise the billing will be considered accepted as billed.

Thank you for choosing D&R Reporting & Video, Inc., for all your litigation support needs. We appreciate your business.

(-) Payments/Credits:	309.00
(+) Finance Charges/Debits:	0.00
(=) New Balance:	\$0.00

Tax ID: 73-1334253

Please detach bottom portion and return with payment.

Kari Hawkins
 Assistant Attorney General
 313 NE 21st
 Oklahoma City, OK 73105

Invoice No. : 128572
 Invoice Date : 6/8/2021
Total Due : \$0.00

Remit To: **D&R Reporting & Video, Inc.**
Metropolitan Building
400 N. Walker
Suite 160
Oklahoma City, OK 73102

Job No. : 36045
 BU ID : 1-MAIN
 Case No. :
 Case Name : Garland v. Eddie Warrior Correctional

*Okay to Pay.
Kari Hawkins*

D&R Reporting & Video, Inc.
Metropolitan Building
400 N. Walker
Suite 160
Oklahoma City, OK 73102

Kari Hawkins
Assistant Attorney General
313 NE 21st
Oklahoma City, OK 73105

INVOICE

1 of 1

Invoice No.	Invoice Date	Job No.
128572	6/8/2021	36045
Job Date	Case No.	
5/19/2021		
Case Name		
Garland v. Eddie Warrior Correctional		
Payment Terms		
Due upon receipt		

1 CERTIFIED COPY OF TRANSCRIPT OF:

Randy Knight

309.00

TOTAL DUE >>>**\$309.00**

Location of Job : D & R OKC
400 N. Walker, Suite 160
Oklahoma City, OK 73102

All billing questions should be addressed within 15 days of receipt of invoice otherwise the billing will be considered accepted as billed.

Thank you for choosing D&R Reporting & Video, Inc., for all your litigation support needs. We appreciate your business.

Tax ID: 73-1334253

Please detach bottom portion and return with payment.

Kari Hawkins
Assistant Attorney General
313 NE 21st
Oklahoma City, OK 73105

Invoice No. : 128572
Invoice Date : 6/8/2021
Total Due : \$309.00

Remit To: **D&R Reporting & Video, Inc.**
Metropolitan Building
400 N. Walker
Suite 160
Oklahoma City, OK 73102

Job No.	:	36045
BU ID	:	1-MAIN
Case No.	:	
Case Name	:	Garland v. Eddie Warrior Correctional

1 IN THE UNITED STATES DISTRICT COURT FOR THE
2 EASTERN DISTRICT OF OKLAHOMA

3
4 (1) LAURIE GARLAND, an)
5 individual,)
6 Plaintiff,)
7)
8 vs.) Case No. CIV 2020-306-Raw
9)
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16 DEPOSITION OF RANDY KNIGHT

17 TAKEN ON BEHALF OF THE PLAINTIFF

18 IN OKLAHOMA CITY, OKLAHOMA

19 MAY 19, 2021

20
21 REPORTED BY: JULIA JACKSON, CSR

22

23

24

25

Randy Knight

May 19, 2021

Page 2

1 A P P E A R A N C E S

2

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Oklahoma City, OK 73102

6 (405) 235-6693

kkd.law@coxinet.net

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11 KARI HAWKINS

Attorney General's Office

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Oklahoma City, OK 73105

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17 Anthony Allen & Associates

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18 Okmulgee, OK 74447

(800) 409-1915

19 anthony@oklahomaslawfirm.com

20

21

22 ALSO PRESENT:

Breann Johnson

23

24

25

Randy Knight

May 19, 2021

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*Leesa Thompson***I N V O I C E**

1 of 1

D&R Reporting & Video, Inc.
 Metropolitan Building
 400 N. Walker
 Suite 160
 Oklahoma City, OK 73102

Jeb Joseph
 Assistant Attorney General
 313 NE 21st
 Oklahoma City, OK 73105

Invoice No.	Invoice Date	Job No.
128871	7/15/2021	36625
Job Date	Case No.	
7/6/2021		
Case Name		
Garland v. State of OK		
Payment Terms		
Due upon receipt		

ORIGINAL AND 1 CERTIFIED COPY OF TRANSCRIPT OF:

Laurie Garland

1,382.98

TOTAL DUE >>>**\$1,382.98**

Location of Job : D & R OKC
 400 N. Walker, Suite 160
 Oklahoma City, OK 73102

All billing questions should be addressed within 15 days of receipt of invoice otherwise the billing will be considered accepted as billed.

Thank you for choosing D&R Reporting & Video, Inc., for all your litigation support needs. We appreciate your business.

(-) Payments/Credits:	1,382.98
(+) Finance Charges/Debits:	0.00
(=) New Balance:	\$0.00

Tax ID: 73-1334253*Please detach bottom portion and return with payment.*

Jeb Joseph
 Assistant Attorney General
 313 NE 21st
 Oklahoma City, OK 73105

Invoice No. : 128871
 Invoice Date : 7/15/2021
Total Due : \$0.00

Remit To: **D&R Reporting & Video, Inc.**
Metropolitan Building
400 N. Walker
Suite 160
Oklahoma City, OK 73102

Job No. : 36625
 BU ID : 1-MAIN
 Case No. :
 Case Name : Garland v. State of OK

I N V O I C E

1 of 1

D&R Reporting & Video, Inc.
 Metropolitan Building
 400 N. Walker
 Suite 160
 Oklahoma City, OK 73102

Jeb Joseph
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 313 NE 21st
 Oklahoma City, OK 73105

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Tax ID: 73-1334253

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Jeb Joseph
 Assistant Attorney General
 313 NE 21st
 Oklahoma City, OK 73105

Invoice No. : 128871
 Invoice Date : 7/15/2021
Total Due : \$1,382.98

Remit To: **D&R Reporting & Video, Inc.**
Metropolitan Building
400 N. Walker
Suite 160
Oklahoma City, OK 73102

Job No. : 36625
 BU ID : 1-MAIN
 Case No. :
 Case Name : Garland v. State of OK

Laurie Garland

July 6, 2021

Page 1

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

LAURIE GARLAND,)
)
Plaintiff,)
)
vs.) NO. CIV-20-306-Raw
)
)
STATE OF OKLAHOMA, ex rel)
OKLAHOMA DEPARTMENT OF)
CORRECTIONS,)
CHRISTOPHER REDEAGLE,)
individually,)
SHARON MCCOY, individually,)
JOE ALLBAUGH, individually,)
RABECKAH MOONYHAM,)
individually,)
HEATHER CARLSON, individually,)
and BOARD OF CORRECTIONS,)
)
Defendants.)

DEPOSITION OF LAURIE ELIZABETH GARLAND
TAKEN ON BEHALF OF THE DEFENDANTS
IN OKLAHOMA CITY, OKLAHOMA
ON JULY 6, 2021, 2021

REPORTED BY: JANA C. HAZELBAKER, CSR

Laurie Garland

July 6, 2021

Page 2

1

A P P E A R A N C E S

2

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4 For the Plaintiff:

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Oklahoma City, OK 73102
(405) 235-6693
kkd.law@coxinet.net

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9 For the Defendant,
Christopher Redeagle:

Anthony L. Allen
Attorney at Law
106 South Okmulgee Avenue
Okmulgee, OK 74447
(918) 625-0131
tony@anthonyallen.com

10

11

12

13

14 For the Defendants,
State of Oklahoma,
ex rel Oklahoma
15 Department of
Corrections, et al.:

Jeb Joseph
Kari Hawkins
Assistant Attorney General
313 Northeast 21st Street
Oklahoma City, OK 73105
(405) 522-2976
jeb.joseph@oag.ok.gov
kari.hawkins@oag.ok.gov

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Also Present: Breann Johnson, intern

Laurie Garland

July 6, 2021

Page 3

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I N V O I C E

1 of 1

D&R Reporting & Video, Inc.
 Metropolitan Building
 400 N. Walker
 Suite 160
 Oklahoma City, OK 73102

Jessica Wilkes
 Office of the Attorney General
 313 NE 21st Street
 Oklahoma City, OK 73105

Invoice No.	Invoice Date	Job No.		
132351	9/6/2022	39685		
Job Date	Case No.			
8/25/2022				
Case Name				
Garland v. State of OK				
Payment Terms				
Due upon receipt				

1 CERTIFIED COPY OF TRANSCRIPT OF:

Susan McCoy

363.00

TOTAL DUE >>>**\$363.00**

Location of Job : Jeffrey Contreras
 25 East Carl Albert Parkway, Suite A
 McAlester, OK 74501

All billing questions should be addressed within 15 days of receipt of invoice otherwise the billing will be considered accepted as billed.

Thank you for choosing D&R Reporting & Video, Inc., for all your litigation support needs. We appreciate your business.

Tax ID: 73-1334253

Please detach bottom portion and return with payment.

Jessica Wilkes
 Office of the Attorney General
 313 NE 21st Street
 Oklahoma City, OK 73105

Invoice No. : 132351
 Invoice Date : 9/6/2022
Total Due : \$363.00

Remit To: **D&R Reporting & Video, Inc.**
Metropolitan Building
400 N. Walker
Suite 160
Oklahoma City, OK 73102

Job No. : 39685
 BU ID : 1-MAIN
 Case No. :
 Case Name : Garland v. State of OK

Sharon McCoy

August 25, 2022

Page 1

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF OKLAHOMA

LAURIE GARLAND,)
)
Plaintiff,)
)
vs.) No. CIV-2020-306-Raw
)
STATE OF OKLAHOMA ex rel)
OKLAHOMA DEPARTMENT OF)
CORRECTIONS, CHRISTOPHER)
REDEAGLE, Individually,)
SHARON McCLOY, Individually,)
JOE ALLBAUGH, Individually,)
PENNY LEWIS, Individually,)
RABEKAH MOONEYHAM,)
Individually, HEATHER)
CARLSON, Individually and)
BOARD OF CORRECTIONS,)
)
Defendants.)

* * * * *

DEPOSITION OF SHARON McCLOY

TAKEN ON BEHALF OF THE PLAINTIFF

IN MCALESTER, OKLAHOMA

ON AUGUST 25, 2022

* * * * *

*****ALL EXHIBITS ARE CONFIDENTIAL
AND SUBJECT TO PROTECTIVE ORDER*****

Sharon McCoy

August 25, 2022

Page 2

1 APPEARANCES

2 FOR THE PLAINTIFF:

3 Henry Dalton
4 E.W. Keller
5 KELLER, KELLER & DALTON, PC
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7 FOR THE DEFENDANTS STATE OF OKLAHOMA EX REL:.

8 Jessica A. Wilkes
9 Jeb Joseph
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405-522-2944
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13 FOR THE DEFENDANT CHRISTOPHER REDEAGLE:

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Okmulgee, Oklahoma 74447
800-409-1915
17 anthony@anthonyallen.com

18
19
20 ALSO PRESENT: David San Martin, Attorney for DOC

21

22

23

24

25

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF OKLAHOMA**

(1) LAURIE GARLAND,

Plaintiff,

v.

(1) STATE OF OKLAHOMA, *ex rel.*,
OKLAHOMA DEPARTMENT OF
CORRECTIONS, et al.,

Defendant.

Case No.: 20-cv-306-JWB

DECLARATION OF JEB E. JOSEPH

STATE OF OKLAHOMA)
) ss.
COUNTY OF OKLAHOMA)

Jeb E. Joseph, being of lawful age, and first being sworn upon his oath, deposes and states as follows:

1. I am an Assistant Attorney General with the Oklahoma Attorney General's Office, and I am co-counsel of Record for Defendants Sharon McCoy and Penny Lewis. As such, I have personal knowledge of the matters set forth herein.

2. At the requests of Plaintiff, Assistant Attorneys General traveled from their office in Oklahoma City, OK, to present and/or attend the following witness depositions, in the respectively listed cities, and on the dates indicated:

a. Randy Knight	Oklahoma City, OK	May 19, 2021;
b. Bryan Cox	Tulsa, OK	July 2, 2021;
c. Penny Lewis	Tulsa, OK	July 9, 2021;
d. Christopher Redeagle	Tulsa, OK	July 14, 2021; and
e. Sharon McCoy	McAlester, OK	August 25, 2022

The costs for deposition transcripts and mileage are included in Defendants' Bill of Costs [Doc. 119] and Brief in Support of Bill of Costs [Doc. 120].

3. The Office of the Attorney General paid an amount totaling \$2,981.22 for the transcripts in this matter.

4. The total mileage traveled by the Assistant Attorneys General is 676, and is reflected in the Bill of Costs. [Doc. 119].

Dated this 22nd day of November 2022.



JEB E. JOSEPH, OBA #19137

Assistant Attorneys General
Oklahoma Attorney General's Office
Litigation Division
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Oklahoma City, Oklahoma 73105
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Facsimile: (405) 521-4518
Email: jeb.joseph@oag.ok.gov
Attorneys for Defendants